

REMARKS

In the July 28, 2005 Office Action, the Examiner indicated that claims 16-39 were pending in the application and rejected claims 16-39 under 35 USC § 102(e). In rejecting the claims, U.S. Patent 6,300,947 to Kanevsky (Reference A) was cited. Claims 16-39 remain in the case. The Examiner's rejections are traversed below.

Request for Examiner Interview

The Response filed May 4, 2005 included a Request for Examiner Interview prior to issuing another Office Action to discuss the differences between the invention and the prior art and what changes, if any, in claim language are necessary to clearly recite these differences. The undersigned then spoke to the Examiner on June 20, 2005 and tentatively arranged an Examiner Interview for July 7, 2005. The Examiner failed to return a telephone call on July 7 and instead of contacting the undersigned as requested and had been agreed on June 20, the July 28, 2005 Office Action was issued.

Given the circumstances described above, if the rejection of the claims as anticipated by Kanevsky is not withdrawn, it is respectfully requested that the Examiner contact the undersigned by telephone to arrange an Examiner Interview and withdraw the finality of the July 28, 2005 Office Action instead of issuing an Advisory Action.

Rejection under 35 USC § 102(e)

On pages 2-6 of the July 28, 2005 Office Action, claims 16-39 were rejected under 35 USC § 102(e) as anticipated by Kanevsky using the same language as in the January 4, 2005 Office Action. Since nothing new in Kanevsky was cited in the rejection of the claims, the comments below will primarily address the Response to Argument on page 6 of the July 28, 2005 Office Action which responded to the Applicant's arguments in the December 19, 2004 Amendment.

In response to Applicant's arguments, it was stated that the claims have been given their "broadest reasonable interpretation consistent with the specification ... [but] the limitations from the specification ... [were not read into the claims]" (Office Action, page 6, lines 10-13). On this basis, it was asserted that Kanevsky teaches "predetermined control characters" as recited at, e.g., claim 16, line 4, by teaching "iconic links such as 'World', 'Health'" in Fig. 13, item 1502." It was asserted that these "iconic links are control characters because they redirect users to

another website ... [and] they are predetermined because the website ... [is] predetermined" (Office Action, page 6, lines 20-22).

First, it is noted that neither of the icons in Kanevsky on which the Examiner relied in the July 28, 2005 Office Action is the icon discussed in the January 4, 2005 Office Action which cited "fig. 12, item icon" (January 4, 2005 Office Action, page 6, line 7). Second, the words "World" and "Health" simply identify links to portions of the web page illustrated in block 1501, specifically, "[t]he first link in the second line in block 1502 is WORLD and points to data in the fifth line in block 1501. The second link in the second line in block 1502 is HEALTH and points to data in the sixth line in block 1501" (Kanevsky, column 14, lines 36-40). These lines are respectively "World • Headlines–Summaries–Asian News" and "Health• Headlines–Summaries" where "Headlines" "Summaries" and "Asian News" are "links (underlined words)" (column 14, lines 23-24) which "point to information" (column 14, lines 15-16).

There was no response in the July 28, 2005 Office Action to the statement in the May 4, 2005 Response that "[n]o further explanation was provided of how an icon can perform the function of a control character, particularly, the operation of 'mapping the first data onto second data according to the parameter, based on the predetermined control characters' (claim 16, last two lines)" (May 4, 2005 Response, page 6, lines 16-19). Merely changing the basis of the rejection from "item icon" in Fig. 12 to links in box 1502 in Fig. 13 of Kanevsky does not explain how such links perform "mapping the first data onto second data according to the parameter, based on the predetermined control characters" (claim 16, last two lines). For example, there was no explanation of what is "the parameter" that "according to" which the "mapping" is performed.

The Response to Argument suggests that the limitations recited in the claims can be ignored. Quite to the contrary, the claims have been rejected as **anticipated** by Kanevsky and thus, each operation recited in the claims must be taught by Kanevsky. No explanation was provided of how "mapping ... onto" anything "according to ... [any] parameter, based on the predetermined control characters" is accomplished by two sets of pointers, where the first set of pointers ("World" and "Health") point to respective pointers in the second set ("World • Headlines–Summaries–Asian News" and "Health• Headlines–Summaries") and the pointers in the second set ("Headlines" "Summaries" and "Asian News") point to information. Conceivably such links could be created according to the invention by a mapping operation using some sort of parameter, but Fig. 13 of Kanevsky certainly doesn't teach that operation, nor has any suggestion of this operation been found in the description of Fig. 13 or anywhere else in Kanevsky.

On page 3 of the Office Action, lines 25-29 in column 7 of Kanevsky were cited as disclosing the limitation "mapping the first data onto second data according to the parameter, based on the predetermined control characters" (Office Action, page 3, lines 3-4 and claim 16, last 2 lines). This portion of Kanevsky describes "transform[ing] web pages received from web site 106, via server 104, to adapt the content of the web pages to the size of the display 113 and also to satisfy the user's requirements as specified in the display mode message ..." No explanation was provided in the July 28, 2005 Office Action how the transformation described in column 7 is "based on the predetermined control characters" if the predetermined control characters are "iconic links" (Office Action, page 6, line 19), such as "World" and "Health" in box 1502 of Fig. 13. Rather, column 7, lines 25-29 of Kanevsky clearly states that an entire web page is transformed "to satisfy the user's requirements as specified in the display mode message" while the claims require a much finer operation "according to the parameter, based on the predetermined control characters" where "the parameter" is "based on resources of at least one of a computer performing the mapping and a communication connection between a mobile computer and a data server" (claim 16, lines 5-7) and the "predetermined control characters are included in the first data" (claim 16, line 4). There is no suggestion in Kanevsky that the links in either box 1501 or 1502 affect how the mapping is performed to adjust for the size of the screen. By using control characters, such as HTML tags, as recited in claim 19, to control the mapping operation, the mapping can be performed more simply and with a result that is clearer than the method disclosed by Kanevsky.

For the above reasons and the additional reasons in the May 4, 2005 Response, it is submitted that claim 16 and claims 25, 34 and 35 which recite limitations similar to the quoted limitation from the end of claim 16, patentably distinguish over Kanevsky. Since claims 17-24, 26-33 and 36-39 depend from claims 16, 25 and 35, it is submitted that claims 17-24, 26-33 and 36-39 patentably distinguish over Kanevsky for at least the reasons discussed above with respect to claim 16.

In rejecting claim 19 (assuming that the "16," at the end of line 13 on page 3 should have been a "19,") it was asserted that use of "hypertext markup language tags" (Office Action, page 3, line 14 and claim 19, line 2) as the predetermined control characters was taught at column 9, lines 46-57 of Kanevsky. Assuming that the statements, such as "Width='percent'" (column 9, line 53), are in HTML, these statements are not "iconic links." In other words, the limitations added in claim 19 make it clear that the interpretation of "predetermined control characters" used to reject claim 16 is incorrect and at least the rejection of claim 19 and claims 28 and 37 which recite a similar limitation, should be withdrawn, because the interpretation of "predetermined

control characters" in the rejection of the independent claims is inconsistent with the rejection of claims 19, 28 and 37 which further define the meaning of "predetermined control characters."

Furthermore, it is submitted that the Response to Argument in the January 4, 2005 Office Action does not begin to address the detailed analysis of Kanevsky in the December 19, 2004 Amendment which was repeated in the May 4, 2005 Response. The Examiner is respectfully requested to explain, either in the next Office Action, or in the Examiner Interview requested above, why that analysis is incorrect.

Summary

It is submitted that Kanevsky does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 16-39 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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